

Michael D. Warner (TX Bar No. 00792304)
Benjamin L. Wallen (TX Bar. No. 24102623)
PACHULSKI STANG ZIEHL & JONES LLP
440 Louisiana Street, Suite 900
Houston, TX 77002
Telephone: (713) 691-9385
mwarner@pszjlaw.com
bwallen@pszjlaw.com

Counsel for Landlord Blue Star Frisco Retail, LLC

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

In re:	§	Chapter 11
	§	
TROPHY HOSPITALITY, LLC,¹	§	Case No.: 21-40512
	§	
Debtor.	§	
	§	

**NOTICE OF FILING WITNESS AND EXHIBIT LIST
FOR MAY 18, 2021 HEARING**

Blue Star Frisco Retail, LLC (“Blue Star”) hereby submits the following Witness and Exhibit List for the hearing scheduled on May 18, 2021 at 10:00 a.m. (CT), in the above-styled, bankruptcy case (the “Case”) before the Honorable Brenda T. Rhoades, United States Bankruptcy Judge, 660 North Central Expressway, Plano, Texas 75074.

WITNESS LIST

Blue Star may call the following witnesses:

1. Kaleisha Stuart.
2. Colleen Burrows.
3. Any witness listed, offered, or called by any other party.
4. Any witness required for rebuttal or impeachment.

¹ The Debtor’s address is 3351 Waverly Drive, Celina, TX 75009. The last four digits of its tax identification number are 5814.

EXHIBIT LIST

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	Shopping Center Lease dated October 26, 2016; and First, Second and Third Amendments to same				
2.	Chart of Accounting of prepetition amounts due to Blue Star				
3.	Notice of Default letter dated March 18, 2021				
4.	Letter of Default dated March 30, 2021				
5.	Notices of Postpetition Incidents				
6.	Trophy Hospitality Financial Statements				
7.	List of 174 Calls for Police Service				
8.	Deposition of Representative to Trophy Hospitality (T/B/P)				
9.	Declaration of Kaleisha Stuart				
10.	Declaration of Colleen Burrows				
11.	Schedules of Assets and Liabilities and Statement of Financial Affairs [Docket No. 19]				
12.	Any exhibits listed, designated, or offered by any other party.				
13.	Any exhibits necessary for rebuttal.				

Blue Star reserves the right to modify, amend or supplement this Exhibit and Witness List at any time. Blue Star reserves the right to ask the Court to take judicial notice of pleadings, transcripts and/or documents filed in or in connection with this Case, to offer rebuttal exhibits, and to supplement or amend this Witness and Exhibit List at any time prior to the May 18, 2021 Hearing. Designation of any exhibit above does not waive any objections that Blue Star may have to any exhibit listed on any other party's exhibit list.

Dated: May 13, 2021

Respectfully submitted,

/s/ Michael D. Warner

Michael D. Warner (TX Bar No. 00792304)
Benjamin L. Wallen (TX Bar. No. 24102623)
PACHULSKI STANG ZIEHL & JONES LLP
440 Louisiana Street, Suite 900
Houston, TX 77002
Telephone: (713) 691-9385
Email: mwarner@pszjlaw.com
Email: bwallen@pszjlaw.com

Counsel for Blue Star Frisco Retail, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of May, 2021, a true and correct copy of the above and foregoing has been served on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in this case.

/s/ Michael D. Warner

Michael D. Warner